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OFFICE OF THE
EXECUTIVE SECRETARY
March 27, 2002

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VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Petition of MCI WorldCom to Enforce Interconnection Agreement with BellSouth*
Docket No. 99-00662

Dear Mr. Waddell:

Enclosed please find the original and thirteen copies of a Joint Petition for Reconsideration.

Cordially,

Joelle Phillips

JP/jej

Enclosure

cc: Henry Walker

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: ***Petition of MCI WorldCom to Enforce Interconnection Agreement with BellSouth***

Docket No. 99-00662

JOINT PETITION FOR RECONSIDERATION

MCI WorldCom ("MCI") and BellSouth Telecommunications, Inc. ("BellSouth") respectfully request clarification of certain aspects of the March 14, 2002 Second Initial Order ("Order") of the Hearing Officer in the above-referenced case for the reasons discussed below.

At page 29 of the Order, the Hearing Officer discussed the issue of calls outside the local calling area. As "examples" of such calls, the Order highlights certain locations and indicates that calls originated from these locations and terminating to certain other locations should not be included in connectivity billing by MCImetro to BellSouth. The calls listed are calls from the following Mississippi locations/rate centers to Tennessee locations/rate centers:

- (1) Hernando, Mississippi location, part of the Hernando, Mississippi rate center;
- (2) Michigan City, Mississippi location, part of the Grand Junction, Tennessee rate center;
- (3) Mount Pleasant, Mississippi location, part of the Collierville, Tennessee rate center;
- (4) Memphis, Mississippi location, part of the Memphis, Tennessee rate center;

While the order is correct as far as examples one and two are concerned, the conclusion reached for examples three and four are flawed.

The Order states that "MCI records these calls as part of its local calling area, but these calls are clearly interstate, not intrastate calls, and should be treated as such in all calculations of

local minutes of use under the Agreement." It appears that the fact that the various locations are in a different state -- Mississippi -- leads the Hearing Officer to conclude that these are interstate long distance calls and not properly included in connectivity billing for local and intraLATA toll calls under the MCIIm-BellSouth interconnection agreement. However, the area around Memphis designated as Local Access Transport Area (LATA) 468 includes geographic territory that encompasses locations and rate centers in northern Mississippi. (Memphis LATA 468 Map attached).

As discussed in the hearings in this matter, MCImetro rates the calls as local or toll based on the originating and terminating rate centers listed in Section 3.6.1 of the BellSouth Local Exchange Service Tariff. Within the Memphis LATA 468, as can be seen in Section 3.6.1 of the BellSouth Local Exchange Service Tariff, (copies of the relevant pages are attached) the Memphis Metropolitan Local Calling Area includes the Mississippi locations of Memphis, Mississippi which is part of the Memphis, Tennessee rate center and Mt. Pleasant, Mississippi which is part of the Collierville, Tennessee rate center. Therefore, calls from these Mississippi locations to Tennessee locations that are part of the Memphis Metropolitan Local Calling Area, while technically "interstate" are classified and treated by BellSouth as "local" calls within the Memphis Metropolitan Local Calling Area pursuant to the terms of the Tennessee tariff. If a MCImetro customer in a Tennessee location that is part of the Memphis Metropolitan Local Calling Area placed a call to a BellSouth customer in a Mississippi location that is part of the Memphis Metropolitan Local Calling Area (e.g. Memphis, Mississippi), BellSouth would properly bill MCImetro for the termination of a local call at the reciprocal compensation rates set forth in the MCImetro-BellSouth interconnection agreement, and vice versa. Calls meeting the criteria in the hearing officers examples three and four (see above) fall into this category.

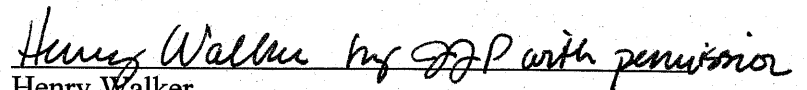
Calls meeting the criteria in examples one and two (Hernando, Mississippi which is part of the Hernando, Mississippi rate center and Michigan City which is part of the Grand Junction, Tennessee rate center) to locations in Tennessee that are inside or outside of the Memphis Metropolitan Local Calling Area, but within the Memphis LATA 468, would be intraLATA toll calls and subject to connectivity billing at terminating switched access rates. Again, while technically "interstate," these calls are also intraLATA toll calls. While BellSouth has not yet obtained authority pursuant to 47 U.S.C. § 271 to provide long distance service, BellSouth is currently permitted to provide interstate, intraLATA toll services (*see* BellSouth's FCC Tariff No. 4, copy attached). For example, when a BellSouth customer located in Mississippi but outside the Memphis Metropolitan Local Calling Area (*e.g.* Hernando or Michigan City) but within the Memphis LATA, places a toll call to a MCImetro customer in Tennessee inside the Memphis LATA, either inside or outside the Memphis Metropolitan Local Calling Area, MCImetro would properly bill BellSouth for the termination of a toll call at the terminating switched access rates set forth in MCImetro's Tennessee interstate access tariff, and vice versa.

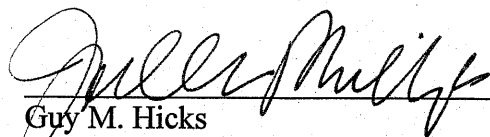
Thus, the key criteria to be applied in the determination of whether a call should be classified as local or interstate, intraLATA toll is whether or not the originating and terminating points are both within the Memphis Metropolitan Local Calling Area. We respectfully submit the following suggested language change in the order to reflect the proper classification of these types of calls:

"MCI records These calls as are part correctly recorded by MCI as part of its local calling area, but so long as the originating and terminating points are both within the Memphis Metropolitan Local Calling Area. these Those calls that do not meet this criteria are clearly interstate intraLATA toll, not intrastate local calls, and should be treated as such in all calculations of local minutes of use under the Agreement."

For the foregoing reasons, therefore, BellSouth and MCImetro respectfully request that the Order be modified by the Hearing Officer to recognize that the rate centers listed at page 29 of the Order are properly subject to connectivity billings by the parties as either local or intraLATA toll calls as discussed above.

Respectfully submitted,


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